

GEORGE C. HUTCHINSON (SBN 138735)  
PATRICK L. BLAIR (SBN 201345)  
LEGAL SOLUTIONS 2 U  
A Professional Corporation  
18201 Von Karman, Ste. 701  
Irvine, California 92616  
Telephone: (855) 755-2928  
Facsimile: (855) 755-2928  
[gchutchinson@legalsolutions2u.com](mailto:gchutchinson@legalsolutions2u.com)

Attorneys for Defendant:  
BRANDREP, LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

A1 ON TRACK SLIDING DOOR  
REPAIR AND INSTALLATION,  
INC, SYLVIA SCHICK, and  
DEBORAH SCHICK, individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

vs.

BRANDREP, LLC, a Delaware  
limited liability company,

Defendant.

Case No. 3:21-CV-03013-SI

**BLAIR DECLARATION IN  
SUPPORT OF BRANDREP,  
LLC'S REPLY TO  
PLAINTIFFS' OPPOSITION TO  
THE MOTION TO SET ASIDE  
DEFAULT (FRCP 55(c))**

Date: September 24, 2021  
Time: 10:00 a.m.  
Courtroom: 1  
Judge: Hon. Susan Illston

First Amended Complaint Filed on  
April 29, 2021

**BLAIR DECLARATION IN SUPPORT OF BRANDREP, LLC'S REPLY TO  
PLAINTIFFS' OPPOSITION TO THE MOTION TO SET ASIDE  
DEFAULT (FRCP 55(c))**

1. I am an attorney in the State of California and an associate of Legal

Solutions 2 U, APC, the law firm representing defendant Brandrep, LLC.

**BLAIR DECLARATION IN SUPPORT OF BRANDREP, LLC'S REPLY TO PLAINTIFFS' OPPOSITION TO THE MOTION TO  
SET ASIDE DEFAULT (FRCP 55(c))**

- 1 2. I recently joined the firm and started working on this case.
- 2 3. After reviewing recent case law, I believe the facts are so heavily
- 3 weighed against the Plaintiff's that if the court deems it best that
- 4 BrandRep answer the complaint rather than file a Rule 12(b) motion to
- 5 the complaint in this case than my office will gladly produce an answer
- 6 in a timely manner.
- 7
- 8 4. With the exception of paragraph 14 of the first amended complaint,
- 9 which states; "Defendant BrandRep is an internet marketing company
- 10 headquartered in Irvine, California[,]" the answer that would eventually
- 11 be filed against the first amended complaint will effectively deny the
- 12 remainder of plaintiffs' allegations. The effective denials will come from
- 13 either "deny" responses or "is without sufficient knowledge or
- 14 information sufficient to form a belief as to the truth or falsity of
- 15 allegations" responses. By filing said answer, all of the defenses cited in
- 16 the reply brief will be viable defenses that should be adjudicated on the
- 17 merits.
- 18
- 19 5. BrandRep will also assert a number of affirmative defenses such as
- 20 standing issues, zone of interest issues, unclean hands, statutes of
- 21 limitation, and no breach of the TCPA regulations.
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27 I declare under penalty of perjury under the laws of the State of California  
28 and the United States of America that the foregoing is true and correct.

**BLAIR DECLARATION IN SUPPORT OF BRANDREP, LLC'S REPLY TO PLAINTIFFS' OPPOSITION TO THE MOTION TO  
SET ASIDE DEFAULT (FRCP 55(c))**

1 Dated: September 7, 2021

LEGAL SOLUTIONS 2 U  
A Professional Corporation

3  
4 /s/ Patrick L. Blair  
Patrick L. Blair  
5 Declarant and Attorney for  
6 Defendant Brandrep, LLC  
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